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BY ECF

Hon. Brian M. Cogan
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michael Vax, 22 Cr. 324 (BMC)

Dear Judge Cogan:

The defense sentence submission in the referenced matter is due November 7, and the sentencing hearing is scheduled for November 21. Without objection of the government, I write seeking a brief extension. I have been working to address multiple financial matters raised in the PSR by seeking to obtain court and personal records of my client, which I do not yet have. In addition, I am working with medical providers and family members to present a complete picture of my client's medical condition at sentence. As of this date, these matters, central to sentence, have not been completed.

For these reasons, it is respectfully requested that the date for the defense submission in this matter be extended to Monday, December 4, the government submission to December 11, and the sentencing hearing to December 18, 2024, or to a date thereafter convenient to the Court. Mr. Vax is currently at liberty on bail conditions and in compliance with his conditions.

Thank you very much for your attention to this matter.

Respectfully,

Robert A. Soloway

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RAS:sc